

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Application Pursuant to 28 U.S.C. § 1782 of
OKEAN B.V. and LOGISTIC SOLUTION
INTERNATIONAL LIMITED,

Petitioners,

– to take discovery of –

CHADBOURNE & PARKE LLP,

Respondent.

Misc. No. 12-00104 (Part 1)

**DECLARATION OF JOSEPH
CONWELL IN SUPPORT OF
RESPONDENT’S MOTION
TO QUASH SUBPOENA**

JOSEPH CONWELL, hereby declare and state pursuant to 28 U.S.C. § 1746:

1. I am the U.S. Records Manager for the law firm Chadbourne & Parke LLP (“Chadbourne”), located at 30 Rockefeller Plaza, New York, New York. I make this declaration based upon my own personal knowledge and a review of documents in my possession.

2. Chadbourne has three offices in the United States, in Washington, D.C., Los Angeles and New York. In accordance with common practice, Chadbourne personnel forward documents in connection with services provided to clients to my Records Department for storage. All such documents are maintained in storage facilities located in the same city where the office is located. My Records Department maintains a searchable electronic database of all documents that it receives.

3. As a matter of regular business practice, all stored documents are organized by client and, as noted, can be located using a searchable database.

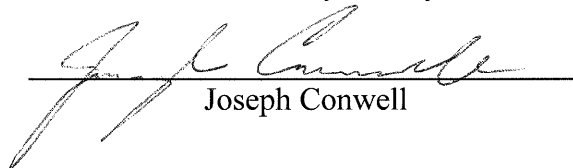
4. All documents sent to Chadbourne Records Departments outside of the U.S. are stored in the country where the office is located.

5. On May 3, 2012, I performed a search of Chadbourne's U.S. Records database for the following entities:

Blakur Company Inc.
Fradomna Investments Ltd.
Okean, B.V.
Olympus Investments (2001) B.V.
Poizanter Holdings Ltd.

In addition, as each Chadbourne client is assigned a unique client number under which client files are organized, I performed a search of Chadbourne's U.S. Records database of the Chadbourne client numbers used by our Ukrainian attorneys for their legal services relating to each of these entities. Those searches turned up no documents or files located in our U.S. Records Department, other than one document from April 2012 concerning a conversation that one of our New York attorneys had with Deborah Skakel, counsel to the Petitioners in this proceeding.

Executed on the 8th day of May, 2012.


Joseph Conwell